



3. Counsel for Plaintiff in this matter have assented to the further extension of the deadline provided by the Fed. R. Civ. P. for response to the Consolidated Amended Class Action Complaint to forty-five days after the Consolidated Amended Class Action Complaint has been filed.

WHEREFORE, Defendants respectfully request that the Court enter an Order further extending the time for Defendants to answer, move or otherwise respond to Plaintiff's Complaint up to and including forty-five days after the Consolidated Amended Class Action Complaint has been filed.

**BIOPURE CORPORATION, THOMAS A.  
MOORE, CARL W. RAUSCH AND RONALD  
F. RICHARDS,**

By their attorneys,

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Robert A. Buhlman, BBO #554393  
Eunice E. Lee, BBO #639856  
BINGHAM McCUTCHEN LLP  
150 Federal Street  
Boston, MA 02110  
(617) 951-8000

Dated: March 15, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was electronically served upon the attorney of record for each party on March 15, 2004.

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Eunice E. Lee

